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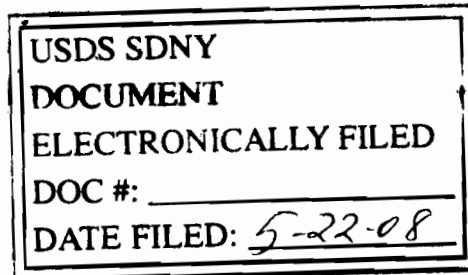
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May 21, 2008

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Our Ref: 20-08/ROSS

Honorable Victor Marrero  
United States District Judge  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Room 660  
New York, NY 10007

RE: Matsuoka Reizo Co., Ltd. v. Sea Trade International, Inc.  
and China Ocean Shipping Co.  
07 CV 10297 (VM)

Dear Judge Marrero:

We are attorneys representing the Defendant CHINA OCEAN SHIPPING CO., LTD. in the captioned litigation pending before Your Honor. With the consent and agreement of all opposing counsel, we respectfully ask that the Court allow the parties an additional 90 days within which to complete all fact discovery. Enclosed is the existing Civil Case Management Plan and Scheduling Order which had set June 6, 2008 for completing fact discovery. This is the first request for an extension of the fact discovery deadline.

The subject litigation is a maritime claim for alleged damage of frozen seafood transported by sea from Tacoma, Washington to Tokyo, Japan. To date, the parties have made their initial disclosure and there has been document discovery. However, additional documentation and information is needed from Japan, where the alleged damaged shipment was delivered, as well as the load port at Tacoma.

Under the circumstances, we respectfully ask that the deadline for completing factual discovery be extended up to September 8, 2008. In addition, we jointly ask that the upcoming June 13, 2008 Pre-Trial Conference, which had been scheduled in conjunction with the completion of discovery, be adjourned until sometime in September following completion of discovery.

Respectfully submitted,  
FREEHILL HOGAN & MAHAR LLP




James L. Ross

ROSS:hr  
Enclosure

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Request GRANTED. The Case Management Plan for this action is amended so as to extend the time for completion of <u>fact discovery</u> to <u>9-18-08</u> . Any other related deadline affected by this extension shall be similarly modified. The next <u>status conference</u> is rescheduled to <u>9-19-08 at 9:45 a.m.</u>	
5-22-08	
DATE	VICTOR MARRERO, U.S.D.J.